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9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11 CARIBBEAN BLUES, INC., doing
12 business as “EKB Textiles,” a
California Corporation,

13
14 Plaintiff,

15 v.

16 ZOETOP BUSINESS CO., LTD., et al.

17 Defendants.
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Case No.: 2:22-cv-05659-DSF-AS
Hon. Dale S. Fischer Presiding

**STIPULATION TO DISMISS
ACTION WITH PREJUDICE**

[FRCP 41(a)(1)(A)(ii)]

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR
2 COUNSEL OF RECORD,

3 PLEASE TAKE NOTICE that Plaintiff Caribbean Blues, Inc. d/b/a “EKB
4 Textiles” and Defendants Zoetop Business Co., Ltd., individually and doing
5 business as “SheIn,” Shein Distribution Corp., and Roadget Business Pte, Ltd.,
6 individually and doing business as “Emery Rose” (collectively, the “Parties”),
7 hereby STIPULATE to the following, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii):

- 8 1. This entire action is hereby dismissed in its entirety with prejudice; and
9 2. The Parties will each bear their respective costs and attorney’s fees as
10 incurred against one another in connection with this action.

11 IT IS SO STIPULATED.

12 Respectfully submitted,

13
14 Date: June 29, 2023

15 By: /s/ Kelsey M. Schultz
16 Stephen M. Doniger, Esq.
17 Trevor W. Barrett, Esq.
18 Kelsey M. Schultz, Esq.
19 DONIGER / BURROUGHS
20 *Attorneys for Plaintiff*

21
22 Date: June 29, 2023

23 By: /s/ Thomas P. Burke, Jr.
24 Morgan E. Pietz, Esq.
25 Thomas P. Burke, Jr., Esq.
26 PIETZ & SHAHRIARI LLP
27 *Attorneys for Defendants*

28 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other
signatories listed, and on whose behalf this filing is submitted, concur in the
filing’s content and have authorized the filing.

Dated: June 29, 2023

By: /s/ Kelsey M. Schultz
Kelsey M. Schultz, Esq.